

STATE OF MICHIGAN
SUPREME COURT

SANDRA M. KNUTH,

Plaintiff/Appellee,

Vs.

THOMAS E. KNUTH,

Defendant/Appellant.

Supreme Court #: 120526
Court of Appeals #: 231167
Macomb CC #: 98-002111-DM
Judge Peter J. Maceroni

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**PLAINTIFF/APPELLEE'S SUPPLEMENTAL RESPONSE TO DELAYED
APPLICATION FOR LEAVE TO APPEAL**

PROOF OF SERVICE

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MICHIGAN SUPREME COURT

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**PLAINTIFF/APPELLEE'S SUPPLEMENTAL BRIEF IN RESPONSE TO
DELAYED APPLICATION FOR LEAVE TO APPEAL**

I. The Argument Section, first paragraph under section II, on page 12 of Plaintiff/Appellee's Brief shall be amended as follows:

Plaintiff-Appellee hereby incorporates in its entirety, her argument regarding this issue as contained in Appendix A, beginning on page A-twenty-four (A-24) of her appellate brief, except that section "B. Preservation of Issue" on page A-twenty-five (A-25) shall be modified as follows:

B. Preservation of Issue

The preservation of issue stated in the appellant's brief regarding the second question involved is complete and correct regarding the sequence of events. However, the issue regarding the Parental Kidnapping Prevention Act was not properly raised and preserved for appeal, as discussed in detail commencing on page 34.

The balance of the paragraph, the section, and the Plaintiff/Appellee's Response to Delayed Application for Leave to Appeal remains as stated in the Plaintiff/Appellee's Response to Delayed Application for Leave to Appeal and Appendix attached thereto.

Respectfully submitted:



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